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1999, 540

**Date:** 5/5/99 4: 14 PM

**Sender:** "Transport Aircraft Technical Services Co. Inc" <tatsco@idworld.net>

**To:** 9-NPRM-CMTS

**Priority:** Normal

**Subject:** COMMENTS PERTAINING TO NPRM 99-2

**FAA-99-5401-5**

The attachment is in M/S Word 6.0

Jim Helms



Nprm9902.doc



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OFFICE OF THE  
CHIEF COUNSEL  
RULES DOCKET  
1999 MAY - 7 A 10: 05

**TRANSPORT AIRCRAFT TECHNICAL SERVICES COMPANY, INC.**  
*An Aircraft Remarketing Services Company*

May 5, 1999

Department of Transportation Dockets  
Docket No. FAA-1999-540 1  
400 Seventh St. SW Room Plaza 401  
Washington, DC 20590

*VIA Internet address: 9-NPRM-CMTS@faa.gov*

Subject AIRCRAFT LANDINGS

Ladies or Gentlemen:

I am commenting on two occurrences of the words "flight cycles" in NPRM 99-02 "Aging Aircraft Safety . . . and the cost of DAR services noted in *the financial analysis*.

NPRM Page 1630 1 " bottom of the left hand column

*In addition, the FAA is aware that an **airframe's flight** cycles are not currently being collected by operators of small airplanes under part 135. This proposal would require that the operator make certain records and reports available to the FAA during the proposed aging airplane records review inspection.*

NPRM Page 16306 " right hand column two inches from the top . . .

*Description of Respondents: Businesses or other for-profit organizations.*

*This proposal would constitute a recordkeeping burden for part 135 operators. **Airframe** flight cycles are not currently required to be collected by operators of small aircraft under part 135.*

I served for several years as a member of the Aircraft Maintenance Records Aviation Rulemaking Advisory Committee " I spoke for the DAR community. One of the items we proposed adding to *the various recordkeeping regulations* was FLIGHT CYCLES or LANDINGS. Our reason was simple . . . **there isn't any 14 CFR requirement to "log" either flight cycles or landings** but there are certain life-limited-parts and Airworthiness Directive Compliance Actions that are based on flight cycles, landings, or engine cycles. The only mention of the words FLIGHT CYCLE is in § 33.14 " Engine Low Cycle Fatigue. The preamble to the

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proposed NPRM requirement should mention this is a new requirement for everyone . . . and the definition of FLIGHT CYCLE<sup>1</sup> would have to be added to 14 CFR § 1.1.

My second comment is the stated (estimated) cost of services to be provided by a Designated Airworthiness Representative – DAR. Current Airworthiness Directive compliance costs are based on \$60.00 per mechanic hour. I don't know how you determined \$55.00 per hour would be appropriate.

I have been a DAR since 1983. For the past ten years my Large Aircraft Airworthiness Inspection and Certification DAR fees have been \$125.00 hour. This cost is based on Appendix A to Part 187 - Methodology for Computation of Fees for Certification Services Performed Outside the United States and Advisory Circular 187-1. NOTE: I am willing to perform simple services, such as issuing a Special Flight Permit for a "small aircraft" on a weekend *-pro-bono - little or no charge*.

In closing . . . We supported the original Aging Aircraft Safety NPRM (issued in 1993) . and we support this one.

Sincerely,

TRANSPORT AIRCRAFT TECHNICAL SERVICES COMPANY, INC.

A handwritten signature in black ink, appearing to read 'F. Helms', with a stylized flourish at the end.

F. James Helms  
President

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<sup>1</sup>For example, there are full stop landings, touch and go landings and reduced engine power takeoffs.